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Attorneys for Respondent TEAMSTERS LOCAL UNION NO. 206

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 19

TEAMSTERS LOCAL UNION NO. 206,

Respondent,

And

SAFEWAY, INC.,

Charging Party.

No. 19-CB-168283
19-CB-178098
19-CB-192630

**OPPOSITION TO MOTION FOR
RECONSIDERATION**

The Board dismissed the charge in its entirety. The employer now seeks to have the Board provide a remedy when the Board found no violation. The remedy that the employer seeks is a finding that the employer has no duty to take action with respect to any grievances. Losers don't get a remedy.

The fact is that Local 206 has a right to pursue grievances and if the pursuit of those grievances violates the Act, Safeway can file another charge.

The Motion constitutes nothing more than whining about an issue that is not before the Board.

The Motion for Reconsideration should be denied summarily.

Dated: August 1, 2019

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /S/ DAVID A. ROSENFELD
DAVID A. ROSENFELD

Attorneys for Respondent TEAMSTERS LOCAL
UNION NO. 206

**PROOF OF SERVICE
(CCP §1013)**

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On August 1, 2019, I served the following documents in the manner described below:

OPPOSITION TO MOTION FOR RECONSIDERATION

(BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from
X kshaw@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

Ms. Jacqueline M. Damm
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
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Mr. John Fawley
National Labor Relations Board, Region 19
Henry M. Jackson Federal Building
915 Second Avenue, Room 2948
Seattle, WA 98174-1078
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 1, 2019, at Alameda, California.

/s/ Katrina Shaw

Katrina Shaw